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March 2, 2022

By ECF

The Honorable Lewis A. Kaplan United States District Court Southern District of New York 500 Pearl Street New York, New York 10007 Fax: (212) 805-4060

Re: United States v. Chanette Lewis et al., No. 21 Cr. 729

Dear Judge Kaplan:

I write to respectfully request an order temporarily modifying the conditions of Tatiana Daniel's pretrial release to permit her to travel to Atlanta for her birthday. I have conferred with counsel for the government and with Pretrial Services. Neither has an objection to this application.

Ms. Daniel is out of custody on a \$150,000, unsecured bond. One of the conditions of her release is that travel is limited to the Southern and Eastern District of New York and the District of New Jersey. If approved, Ms. Daniel would leave March 17th and return March 21st. She plans to travel by air to Atlanta, Georgia, with two companions: her best friend and her partner. She would stay at an AirBnB, the particular location of which she would make known to Pretrial Services as soon as she has that information. The Court's considerate attention to this matter is greatly appreciated.

Respectfully submitted,

Ezra Spilke

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cc:

Tatiana Daniel, by email AUSA Michael Neff, by email Christina Venable, by email

SO ORDERED

LEWIS A. KAPLAN, LISDI